

# **Exhibit G**

## Exhibit B

## U.S. Patent No. 6,892,211

Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
1, 3, 9, 11, 17, 19	"root inode"	<p><b><u>PROPOSED CONSTRUCTION:</u></b> An inode that points directly and/or indirectly to all the blocks in a consistent state of a "file system" (as construed herein).</p> <p><b><u>INTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>• See 4:26-37; 5:58-8:8; 9:35-50; 10:58-11:27; 13:59-14:6; 18:1-16; Claims 1, 9 and 17; Figs. 16, 17A-17L, 20A-20C and 21A-21F and accompanying text.</li> </ul> <p><b><u>EXTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>• Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>• NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	<p><b><u>PROPOSED CONSTRUCTION:</u></b> "the index node data structure stored in a fixed location that roots a set of self-consistent blocks on the storage system that comprise the file system"</p> <p><b><u>EVIDENCE:</u></b></p> <ul style="list-style-type: none"> <li>• '211 Patent: Figs. 15, 16, 17B-L and associated disclosure, Figs. 21A-F and associated disclosure, Fig. 22 and associated disclosure, Col. 4:10-49, Col. 10:58-11:27, Col. 11:60-12:36; Col. 13:59-14:28, Col. 17:59-18:32; claims 1, 3, 9, 11, 17, 19.</li> <li>• <b>root:</b> the main or uppermost level in a hierarchically organized set of information. The root is the point from which subsets branch in a logical sequence that moves from a broad focus to a narrower perspectives. MICROSOFT PRESS COMPUTER DICTIONARY, 3rd Ed. (1997) p. 414.</li> <li>• <b>inode:</b> in Unix and Unix-like operating systems (including Linux), a basic concept of file system organization in which the file system can contain a predefined number of virtual files, each of which has a precise numerical identifier. Associated with each inode is a set of attributes, including file type, access rights, file ownership, file permissions, timestamps, size and pointers to the physical data blocks where the file's data is stored. WEBSTER'S NEW WORLD DICTIONARY OF COMPUTER TERMS, 8th ed. (2000), p. 277.</li> <li>• Testimony by Sun's expert, Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>• Sun reserves the right to rely on any evidence identified by NetApp.</li> </ul>

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Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
1-3, 9-11, 17-19	"consistent state"	<p><b>PROPOSED CONSTRUCTION:</b> A set of blocks on disk, rooted by a "root inode" (as construed herein), that includes all the blocks required for the data and file structure of a "file system" (as construed herein).</p> <p><b>INTRINSIC EVIDENCE</b></p> <ul style="list-style-type: none"> <li>See 4:12-24; 9:25-50; 10:58-11:27; 11:61-12:23; 15:24-17:57; 20:15-22; 23:41-56; Figs. 5-6, 16, 17A-17L and accompanying text.</li> </ul> <p><b>EXTRINSIC EVIDENCE</b></p> <ul style="list-style-type: none"> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	<p><b>PROPOSED CONSTRUCTION:</b> "a set of storage blocks for that file system that includes all blocks required for the data and structure of the file system"</p> <p><b>EVIDENCE:</b></p> <ul style="list-style-type: none"> <li>'211 Patent: Abstract, Col. 1:16-4:48.</li> <li>'292 Patent, Abstract; 4:6-20; ;11:6-27; 11:60-12:8; 15:29-17:64; 22:25-23:18; 24:7-9, claim 8; Figs. 16; 17A-L; 20A-C and accompanying description.</li> <li>'292 Prosecution History, Amendment and Response filed on or about December 29, 1994, and references cited therein.</li> <li>'292 Prosecution History, Information Disclosure Statement filed 9/1/1995 and references cited therein.</li> <li>'292 Prosecution History, Office action mailed February 10, 1997 and references cited therein.</li> <li>'292 Prosecution History, Submission filed on or about May 7, 1997 and references cited therein.</li> <li>U.S. Patent No. 7,174,352.</li> <li><b>consistent:</b> 1. in agreement; compatible. 2. Being in agreement with itself; coherent and uniform. THE AMERICAN HERITAGE COLLEGE DICTIONARY, 3rd. Ed. (1993), p. 297.</li> <li>Testimony by Sun's expert, Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>Sun reserves the right to rely on any evidence identified by NetApp.</li> </ul>
1, 9, 17	"pointing directly and indirectly to buffers in said memory and a second set of	<p><b>PROPOSED CONSTRUCTION:</b> No construction necessary, plain and ordinary meaning. To the extent the Court deems a construction necessary, the term means pointing directly to blocks and/or buffers, and/or indirectly</p>	<p><b>PROPOSED CONSTRUCTION:</b> "pointing directly and indirectly to buffers in said memory and pointing directly and indirectly to a second set of blocks on said storage system"</p>

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	blocks on said storage system"	<p>to blocks and/or buffers.</p> <p><b><u>INTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>See 5:62-8:57; 11:7-27; 19:34-37; Figs. 3, 4A-4D, 8, 9A-9D, 10, 16, 17A-17L, 19 and 21A-21F and accompanying text.</li> </ul> <p><b><u>EXTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>See '764 File History at Jan. 28, 2003 Response to Final Office Action at 19-20.</li> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> </ul> <p>NetApp reserves the right to rely on any evidence identified by Sun.</p>	<p><b><u>EVIDENCE:</u></b></p> <ul style="list-style-type: none"> <li>'211 Patent: Figs. 8-10 and associated disclosure, Figs. 17A-L and associated disclosure, Col. 5:62-8:57, Col. 15:23-17:57, Col. 23:60-26:4.</li> <li>'211 Pros. History: Notice of Allowability and accompanying examiner's statement of reasons for allowance.</li> <li>Testimony by Sun's expert, Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>Sun reserves the right to rely on any evidence identified by NetApp.</li> </ul>
1-3, 9-11, and 17-18	"file system"	<p><b><u>PROPOSED CONSTRUCTION:</u></b> A system that logically organizes file-related information (such as directories, files and blocks) in a tree structure.</p> <p><b><u>INTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>See 9:25-11:27; 11:60-12:7; 15:42-16:3; 20:7-14; 15:42-16:3; Claim 11; Fig. 16 and 17A-17D and accompanying text.</li> </ul> <p><b><u>EXTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>See '292 File History at Jan. 28, 1995 Amendment and Response at 14.</li> <li>See '764 File History at Aug. 8, 2003 Response to Office Action at 16.</li> <li>Dr. Greg Ganger may testify concerning the</li> </ul>	<p><b><u>PROPOSED CONSTRUCTION:</u></b> "a collection of files and file management structures"</p> <p><b><u>EVIDENCE:</u></b></p> <ul style="list-style-type: none"> <li>'211 Patent: Col. 18:8-20.</li> <li>'292 Patent, Col. 1:18-20; 2:17-4:44; 5:35-12:37; claims 4, 8, 12-15, 20; Figs. 2, 3, 4A-D, 8, 9A-D, 10, 11A-D, 12, 13B, 15, 17A-J, 21E and accompanying description.</li> <li>'292 Prosecution History, Amendment and Response filed on or about December 29, 1994, and references cited therein.</li> <li>'292 Prosecution History, Information Disclosure Statement filed 9/1/1995 and references cited therein.</li> <li>'292 Prosecution History, Office action mailed February 10, 1997 and references cited therein.</li> <li>'292 Prosecution History, Submission filed on or about May 7,</li> </ul>

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Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<p>meaning of this term to one of skill in the art in the context of its use in the '211 patent.</p> <ul style="list-style-type: none"> <li>NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	<p>1997 and references cited therein.</p> <ul style="list-style-type: none"> <li>U.S. Patent 6,857,001.</li> <li><b>file system:</b> a collection of files. Leffler, McKusick et al., THE DESIGN AND IMPLEMENTATION OF THE 4.3 BSD UNIX OPERATING SYSTEM, (1990), p. 422.</li> <li><b>file system:</b> "... collection of files and file management structures on a physical or logical mass storage device..." IBM DICTIONARY OF COMPUTING, 10th Ed. (1993), p. 271.</li> <li><b>file system:</b> (1) a collection of files and certain of their attributes. It provides a name space for file serial numbers referring to those files.</li> <li>(2) A collection of files and certain of their attributes. Each file system provides a separate binding of file serial numbers to files. A given file serial number is associated with at most one file in a file system, but it may refer to distinct files in distinct file systems. That is, each file system defines a new <i>name space</i>, giving meaning to the <i>names</i> (file serial numbers) that designate files. THE IEEE STANDARD DICTIONARY OF ELECTRICAL AND ELECTRONICS TERMS, SIXTH ED. (IEEE Std 100-1996), p.407.</li> <li>Testimony by Sun's expert, Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>Sun reserves the right to rely on any evidence identified by NetApp.</li> </ul>
1,3, 9, 11, 17, 19	"incore"	<p><b>PROPOSED CONSTRUCTION:</b> In memory; as opposed to on disk.</p> <p><b>INTRINSIC EVIDENCE</b></p> <ul style="list-style-type: none"> <li>See 5:58-8:8; 7:53-63; Fig. 8 and accompanying text.</li> </ul>	<p><b>PROPOSED CONSTRUCTION:</b> Sun contends this term does not require construction because the term is clear on its face. However, if the Court decides the construe this term, the term should be construed to mean: "in memory."</p>

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		<p><b><u>EXTRINSIC EVIDENCE</u></b></p> <ul style="list-style-type: none"> <li>• Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '292 patent.</li> <li>• NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	<p><b><u>EVIDENCE:</u></b></p> <ul style="list-style-type: none"> <li>• '211 Patent: Figs. 8-10 and associated disclosure, Col. 6:55-61, Col. 23:60-26:4.</li> <li>• U.S. Patent No. 7,174,352.</li> <li>• Testimony by Sun's expert, Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '211 patent.</li> <li>• Sun reserves the right to rely on any evidence identified by NetApp.</li> </ul>